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April 12, 2010

VIA OVERNIGHT DELIVERY

Mr. Charles L.A. Terreni Chief Clerk/Administrator SC Public Service Commission 101 Executive Center Dr., Ste. 100 Columbia, SC 29210 (803) 896-5100

Re: Safari Communications, Inc.

Docket No. 2010-104-C

Dear Mr. Terreni:

Enclosed please find for filing an original and twenty-five (25) copies of the company's pre-filed testimony. The company does not intend to engage in telemarketing in the State of South Carolina.

I have enclosed an extra copy of this letter to be date-stamped and returned to me in the self-addressed, postage prepaid envelope I have provided.

DETURN DATE OF OC

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me. Thank you.

Respectfully submitted,

Claudia McDowell

Legal Assistant to Lance J.M. Steinhart Attorney for Safari Communications, Inc.

Panda RM Dowell

Enclosure

Thomas Peltier (w/enc)

Shealy Boland Reibold, Esq. ORS
P. O. Box 11263
Columbia, SC 29211

Shealy Boland Reibold - ORS via e-mail: sreibol@regstaff.sc.gov

Scott Elliott, Esq. (w/enc) Elliott & Elliott, P.A. 721 Olive Street Columbia, SC 29205

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4 5			SOUTH	I CAROLINA		
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7			DOCKET NO. 2010-1	04-C ORDER NO. 2010-247	:	
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13			nunications, Inc.)		
14		-	cate of Public) DIRECT TESTIMONY		
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17			nications Services and)		
18 19			vice offerings to be regulated)		
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21	No. 98-165 in docket No. 97-467-C; and					
22			hange service offerings to be)		
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24	regulated in accordance with procedures established for alternative regulation in Order Nos. 95-1734 and 96-55 in)		
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29			I. <u>Ir</u>	ntroduction		
30	1.	Q.	Please state your name and b	usiness address.		
31		A.	My name is Thomas Peltier.	My business address is 4915 I	Dorothy Avenue,	
32			Sarasota, Florida 34235.			
33	2.	Q.	By whom are you employed a	and in what capacity?		
34		A.	I am the President of Safari Co	mmunications, Inc. ("Safari").		
35	3.	Q.	Please give a brief descriptio	on of your background and experi	ience in business	
36			and telecommunications.			
37		A.	See Exhibit D to our applicatio	n.		

1 4. Q. What is the purpose of your testimony?

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A. The purpose of my testimony is to describe the nature of Safari's proposed service offering within the State of South Carolina, and to demonstrate its financial, managerial, and technical ability to provide the telecommunications services for which authority is sought herein.

6 5. Q. Do you wish to incorporate by reference any documents into your testimony?

7 A. Yes. I wish to incorporate by reference the underlying Application filed in this proceeding and its associated attachments.

II. The Business of Safari

10 6. Q. Has Safari registered to do business in South Carolina?

A. Yes. Safari is a Florida Corporation that has received authorization to transact business within the State of South Carolina. A copy of Safari's Articles of Incorporation is attached to the Application as Exhibit A and a copy of the document of authorization from the State of South Carolina is attached to that Application as Exhibit B.

1	7.	Q.	Please describe the services Safari intends to provide within the State of South
2			Carolina.
3			
4			Safari may offer a full array of services to both business and residential
5			customers, including the following:
6			
7			Interexchange (switched and dedicated services):
8			A. 1+ and 101XXXX outbound dialing;
9			B. 800/888 toll-free inbound dialing;
10			C. Calling cards; and
11			D. Data Services.
12			
13			Local Exchange:
14			A. Local Exchange Services for business and residence customers that will
15			enable customers to originate and terminate local calls in the local calling area
16			served by other LECs, including local dial tone and custom calling features.
17			B. Switched local exchange services, including basic service, trunks, carrier
18			access, and any other switched local services that currently exist or will exist in the
19			future.
20			C. Non-switched local services (e.g., private line) that currently exist or will
21			exist in the future.
22			D. Centrex and/or Centrex-like services that currently exist or will exist in the
23			future.
24			E. Digital subscriber line, ISDN, and other high capacity services.
25			
26			Safari will initially resell local and long distance services, and provide local
27			service though the use of use unbundled network elements utilizing the facilities
28			of the existing LECs or underlying carriers that presently serve South Carolina.
29			
30			Safari seeks authority to resell and provide through its own facilities local
31			exchange services throughout the State primarily in the areas served by AT&T.
32			Safari's local calling areas initially will coincide with the incumbent local
33			exchange carrier's local calling areas. Safari has no plans to install facilities in the

State of South Carolina. If Safari installs facilities in South Carolina, it will probably voice and high speed data services through a combination of the latest technology switching and transport media. The switching system will consist of a central processing and control complex capable of interconnection as a peer to the incumbent as well as competitive local exchange companies. The hub portion of the switch will interconnect with the public switched network on Signaling System 7 ("SS7") or Feature Group D ("FGD") facilities. The system's remote module capability will allow properties to be served in a manner that provides the exchange of appropriate signaling, control and calling/caller information to the network in accordance with network standards and specifications. Additionally, these services may be delivered over a combination of delivery mechanisms through incumbent local carriers' unbundled loop network, both copper and fiber and transport networks, as well as via Safari constructed facilities. Its services will be available on a full-time basis, twenty-four hours a day, seven days a week, to customers within the geographic boundaries of the State of South Carolina. Customers will be billed by Safari. Safari is committed to providing access to a local operator, directory assistance, 911 services, and dual relay services. Safari is also willing to accept its obligations to collect 911 and dual relay service surcharges from its local exchange customers, and to remit those funds to the appropriate authorities.

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8. Q. What carrier will Safari utilize as its underlying carrier for services in South Carolina?

- A. For interexchange service, Safari intends to utilize BellSouth Telecommunications,
 Inc. d/b/a/ AT&T South Carolina ("AT&T") as its underlying carriers. Safari
 intends to offer service offer local service using facilities of the incumbent local
 exchange telephone companies ("LECs") certificated to provide local exchange
 service in the State of South Carolina. The company intends to initially negotiate
 with BellSouth.
- Q. Does Safari have authorization to provide intrastate telecommunications
 services in any other state?
- 9 A. Yes, Safari has such in the State if North Carolina.
- 10 10. Q. Has Safari ever had an application for a certificate of public convenience and necessity denied?
- 12 A. No.
- 13 11. Q. Does Safari intend to file a tariff with the Commission?
- A. Yes. Safari filed an interexchange tariff as Exhibit F and a local price list as Exhibit

 E to its Application in this proceeding that it will modify as necessary in order to

 meet the Commission's requirements. We believe Safari's Tariff and price list will

 comport with all Orders, Rules, and Regulations of the Commission.

1 12. Q. Will Safari comply with the Commission's orders regarding the provision of interexchange and local services?

A. Yes. Safari will at all times provide and market services in accordance with current Commission policies. In particular, Safari is familiar with Commission Order No. 93-462 regarding resale of intraLATA telecommunications services and will attempt to comply with the terms of that order in every respect possible. In addition, Safari at all times will provide interstate services in compliance with all FCC rules and regulations. Safari will at all times provide and market services in accordance with current Commission policies and will attempt to comply with the terms of that order in every respect possible.

Τ	13.	Q.	Has Safari provided any intrastate telecommunications services within the
2			State of South Carolina?
3		A.	No it has not.
4	14.	Q.	What rates will Safari charge upon receipt of certification?
5		A.	Safari will charge the tariffed rates approved by the Commission.
6	15.	Q.	How will Safari market services in South Carolina?
7		A.	Safari intends to market its services via direct sales by Safari's employees.
8			III. Managerial, Technical and Financial Qualifications
9	16.	Q.	Does Safari have sufficient managerial, technical, and financial resources and
10			ability to provide the telecommunications services proposed in its Application?
11		A.	Yes. Safari has sufficient technical, financial, and managerial resources and ability
12			to provide the telecommunications services for which authority is sought herein.
13			Safari's personnel represent a broad spectrum of business and technical disciplines,
14			possessing many years of individual and aggregate telecommunications experience.
15			The qualifications and experience of Safari's key management team are discussed on
16			Exhibit D which is attached to our Application in support of Safari's managerial and
17			technical ability to provide the services for which authority is sought herein.

1	17.	Q.	How does Safari handle customer service requests?
2		A.	Safari's customer service representatives are available to assist its customers and
3			will promptly respond to all customer inquiries. Customers may call INSERT
4			800 or a local number. The applicable toll free or local numbers will be printed
5			on customers' monthly billing statements. Alternately, customers wishing to
6			communicate with a Safari customer service representative in writing may send
7			written correspondence to Safari at:
8 9 10 11 12			Safari Communications, Inc. ATTN: Customer Service 4915 Dorothy Avenue Sarasota, Florida 34235
13			Safari's customer service representatives are prepared to respond to a broad range
14			of service matters, including inquiries regarding: (1) the types of services offered
15			by Safari and the rates associated with such services; (2) monthly billing
16			statements; (3) problems or concerns pertaining to a customer's current service;
17			and (4) general service matters.
18	•		
19	18.	Q.	Please describe the financial condition of Safari.
20		A.	In support of Safari's financial ability to provide the services sought herein, copies of
21			Safari's Profit and Loss Forecast from January throught December 2010, were
22			submitted as Exhibit C to its Application.

1	IV. Public Interes
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Q. How will residents of South Carolina benefit from Safari's services and
 presence in South Carolina?

The Commission's grant of this certificate is in the public interest because consumers of telecommunications services within Safari's service territory will receive increased choice, improved quality of service, and heightened opportunities to obtain improved technology in the homes and businesses. Market incentives for new and old telecommunications providers in South Carolina will be improved greatly through an increase in the diversity of suppliers and competition within the local exchange telecommunications market. Consistent with the Commission's intent to aid in the development of a competitive telecommunications environment in South Carolina, the granting of a certificate of authority to provide local exchange service will offer increased efficiency to the State's telecommunications infrastructure through greater reliability of services and an increase in competitive choices.

- 17 20. Q. Has the Company ever been the subject of an investigation by any state 18 Regulatory body or by the FCC?
- 19 A. No.
- Q. Will the Company agree to abide by and comply with the Commissions
 Rules and Regulations and Commission Orders in its operations in South
 Carolina?
- 23 A. Yes.

2 20. Q. Does this conclude your testimony?

A. Yes. I would like to thank the Commission for this opportunity to provide information relevant to Safari's Application and am ready to provide any additional information that the Commission may need in making its decision.